

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

LAWRENCE L. HERB, JR.

NO. 1-18-bk-02872 HWV  
Chapter 13

CAB EAST LLC/FORD MOTOR CREDIT CO. LLC

ANSWER TO  
MOTION TO COMPEL

V.

LAWRENCE L. HERB, JR., Debtor

Assumption or Rejection

Charles DeHart, III, Trustee

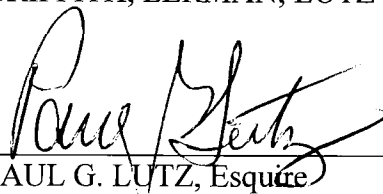
ANSWER OF DEBTOR, LAWRENCE L. HERB, JR., TO MOTION OF  
CAB EAST, LLC/FORD MOTOR CREDIT COMPANY, LLC TO  
COMPEL ASSUMPTION OR REJECTION OF A MOTOR VEHICLE LESE  
RE: 2017 FORD ESCAPE MOTOR VEHICLES 11 USC § 365(d)(2)

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted in part, denied in part. Debtor admits that account is due for September 2, 2018 and that there are eighteen (18) regular payments remaining on the lease at a monthly payment of Three Hundred and sixty three and 05/100 (\$363.05) Dollars. Debtor denies that the approximate balance is Six Thousand Eight Hundred ninety seven and 95/100 (\$6,897.95) Dollars. Debtor is without information sufficient to form a belief relative to any additional expenses, interest or the estimated residual value of the vehicle.
6. Admitted.
7. Denied. Debtor has filed an amended Chapter 13 Plan assuming the lease  
.

WHEREFORE, Debtor, Lawrence L. Herb, Jr. prays this Honorable Court to dismiss the Motion of CAB East, LLC by Ford Motor Credit Company, LLC.

GRIFFITH, LERMAN, LUTZ & SCHEIB

By:

A handwritten signature in black ink, appearing to read "Paul G. Lutz", is written over a horizontal line.

PAUL G. LUTZ, Esquire  
ID 39901

Attorney for Debtor  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 22, 2018, he served a true and correct copy of the Answer Of Debtor, Lawrence L. Herb, Jr., To Motion of Cab East, Llc/Ford Motor Credit Company, Llc to Compel Assumption or Rejection of a Motor Vehicle Lese Re: 2017 Ford Escape Motor Vehicles 11 Use § 365(D)(2) by United States Mail, First Class, Certified, Return Receipt Requested, postage prepaid and electronic filing if available on the following:

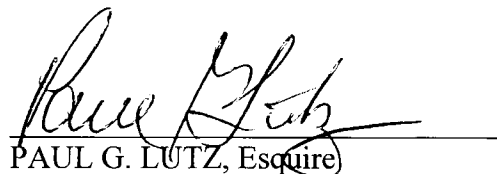
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GRIFFITH, LERMAN, LUTZ & SCHEIB

By:



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